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JUNE 6 2023 @ 5:22 PM EASTERN DISTRICT OF NEW YORK
VIA BOX.COM CASE NO.: 1:22-CV-07221-DG-SJB

JAMES PRICE,
15081 SW 137th Ave
Miami, Florida 33177

SHERRY PRICE,
243-10 138th Ave # 2F
Rosedale, NY 11422
Plaintiffs,

v.

UNITED STATES PROBATION AND
PRE-TRIAL SERVICES, EDNY,
Defendants.

/

**PLAINTIFF'S REQUEST MOTION TO STAY
PROCEEDINGS FOR SIXTY DAYS**

Dear Judge Bulsara:

The Plaintiffs in this case, James Price, and Sherry Price, respectfully request a sixty-day (60) briefing stay. In regard to Plaintiff James Price, the Bureau of Prisons has not demonstrated that it will make him readily available to participate in a settlement conference with counsel.

All parties are working, making their best attempts to settle this matter without having to litigate. Furthermore, since Plaintiff James Price will be released in 46 days, if we are forced to litigate, we will be able to litigate in a regular fashion without needing to delay further.

WHEREFORE, for the reasons listed above, the Plaintiffs respectfully ask this Court for an Order to Stay for sixty days.

Dated: June 6, 2023

Respectfully Submitted,

Sherry Price
Digitally signed by
Sherry Price
Date: 2023.06.06
17:22:51 -04'00'

Sherry Price
243-10 13th Ave #2F
Rosedale, NY 11422